

Application Serial No. 10/783,478
Response Dated January 31, 2007
Response to Office Action mailed November 16, 2006

REMARKS

In view of the preceding amendments and the following comments, and pursuant to 37 C.F.R. § 1.111, Assignee respectfully requests reconsideration of the Non-Final Office Action mailed November 16, 2006 ("Office Action").

Summary

The Office Action mailed on November 16, 2006 provided grounds for rejection of claims 1-21. Assignee has amended independent claims 1, 20, and 21, and dependent Claims 2-19. Assignee has added new dependent claims 22-30. Support for the amendments to Claims 1-21, and new claims 22-30 can be found in the Application at least at ¶¶ 0052, 0091, 0100-0105, 0124, 0125, and 0130. The Assignee respectfully request reconsideration of pending claims 1-30, and allowance of the present application in view of the following remarks.

I. Rejections Under 35 U.S.C. § 102(b)

The Office Action rejected claims 1, 2, 6, 8-9, 11, and 13-21 under 35 U.S.C. § 102(b) as being anticipated by Ariathurai et al. (U.S. Patent Publication No. 2002/0198743 A1).

Claims 1, 20, and 21

With respect to independent claims 1, 20, and 21, the Office Action indicates that Ariathurai discloses a data structure comprising: an account entity class, a customer entity class, and an involvement entity class. See Office Action, pp. 2, and 6. However, although Ariathurai discloses using a tool to "relationally store data" and "relationally organize" data, Ariathurai does not define a relationship between an account entity class, a customer entity class, and an account involvement entity class. Instead, Ariathurai merely indicates that it has a database that

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"includes a set of related database tables which store information related to all aspects of the insurance underwriting process, including customer information, policy information, invoice and billing information and accounting information." See Ariathurai at ¶¶ 0019, 0043, 0044, 0112, 0114, and 0123. The Office Action fills the gap by asserting that Ariathurai inherently includes such features, making reference to Faithe Wempen, Sams Teach Yourself Microsoft Access 2000 (Sams 1999). Specifically, the Office Action notes that the "practice of creating account entity classes among plurality of account data object and one plurality of customer data objects are inherent and well known, [and that] Faithe made clear how to create table relationships in a relational database such as Microsoft Access by establishing relationship among classes or objects." Office Action, pp. 2-3.

Assignee traverses this rejection since Ariathurai, even assuming that it inherently includes features that the Office Action sees in Faithe, does not disclose the combination of relationships defined by claims 1, 20, or 21.

Claims 1, 20, and 21 include an entity class for establishing an account role entity that defines: a first account role for the first customer data object; and a second account role for the first customer data object different from the first account role, for establishing multiple different roles for a customer identified by the customer ID with respect to multiple different accounts identified by the account IDs. Accordingly, account roles "define the role of a customer data object with regard to a particular account data object. Examples of roles include insured, primary contact, and household member." Application at ¶ 0052. In other words, a customer may have the account role of insured under one account, and primary contact under another account. The system of claim 1 provides underwriters with the ability to identify whether a

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customer has multiple relationships with multiple accounts, regardless of the customers role, enabling a holistic approach to customer and account management.

Even assuming that Ariathurai inherently includes creating table relationships or other features from Faithe, Ariathurai still lacks the particular classes, entities, and relationships specified in claim 1. In other words, given **how to create table relationships**, Ariathurai fails to disclose **what table relationships to create**. The number of permutations of unique relationships that maybe defined between any two objects is often immense and is only limited by the number of attributes of the objects. Ariathurai's general discussion of "a relational database," "relationally organized data," and "related database tables" does not disclose, for example, account role entities, let alone disclose the combination of relationships between objects that claims 1, 20 or 21 recites, nor the advantages of such relationships.

In further contrast to claim 21, as amended, Ariathurai does not provide motivation for defining table structures and relationships establishing multiple risk factors related to accounts, customer, products or services, as recited in claim 21, "providing an entity for storing risk information that defines risk factors related to any one of the account data objects, the customer data objects, the product data objects or the service data objects, comprising: risk trends; risk exposures; risk assessments; and risk capacity."

For at least the foregoing reasons, claims 1, 20 and 21, and the claims dependent therefrom are not anticipated by Ariathurai. Thus, the presently pending claims are allowable over the cited references. Accordingly, Assignee respectfully requests that the claim rejections under 35 U.S.C. § 102(b) be withdrawn.

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II. Rejections Under 35 U.S.C. § 103(a)

Claims 3 and 7

The Office Action rejected claims 3 and 7, under 35 U.S.C. § 103(a), as being unpatentable over Ariathurai in view of Faithe. Office Action, p. 7. The Assignee respectfully traverses these rejections. As an initial matter the Assignee notes that for the reasons given above, Ariathurai does not disclose the subject matter of the base claim 1, including the feature of assigning multiple roles to a customer in multiple accounts. The combination of Ariathurai and Faithe ("Ariathurai-Faithe combination"), made in the 103 rejection, does not fill in the gaps to disclose the subject matter of claims 3, or 7, including such roles.

Claims 4 and 5

The Office Action rejected claims 4 and 5, under 35 U.S.C. § 103(a), as being unpatentable over Ariathurai in view of Michael Hernandez, Relational Database Design, (2nd ed., 2003). Office Action, p. 8. Hernandez discloses guidelines for establishing a foreign key. Ariathurai, in combination with Hernandez ("Ariathurai-Hernandez combination"), discloses data structures containing entities that include attributes defined as primary keys and foreign keys. See Office Action, p. 8.

Even assuming motivation to make the Ariathurai-Hernandez combination, the combination does not disclose the features in claim 4 or claim 5 with base claim 1, wherein multiple roles are assigned to a customer in multiple accounts.

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Claims 10 and 12

The Office Action rejected claims 10 and 12, under 35 U.S.C. § 103(a), as being unpatentable over Ariathurai in view of Yeh et al. U.S. Patent Application Publication No. 2003/0149650 A1. Office Action, p. 9.

The Office Action indicates that Ariathurai failed to explicitly disclose the data structure, wherein the entity class includes a role entity that defines a role for customer data objects. See Office Action, p. 9. However, the Office Action fills the gap by contending that Yeh discloses a data structure, wherein a role entity defines a role for a customer data object. Office Action, p. 9. Yeh recites "each account detail transaction could be stored as a row in a ... data base table named for a role that owns that account." Yeh at ¶ 0047. Ariathurai, in combination with Yeh ("Ariathurai-Yeh combination"), discloses roles that own accounts and that a database table may be named for such a role.

Assignee traverses this rejection since the Ariathurai-Yeh combination fails to teach or suggest establishing multiple roles for a customer in multiple accounts, without regard to account ownership status. Even assuming motivation to make the Ariathurai-Yeh combination, the combination does not disclose the features present in claims 10 and 12 with base claim 1, wherein multiple account roles and multiple customer roles are assigned to a customer data object. The features present in claims 10 and 12, for example, allow a customer role of "employer or employee" to be assigned to a customer data object, while the same customer data object maybe assigned the account role of "insured, primary contact, or household member," without regard to the customer data object's account ownership status.

For at least the foregoing reasons, Ariathurai, in view of any combination of Faithe, Hernandez or Yeh, does not teach or suggest each and every limitation of independent claims 1,

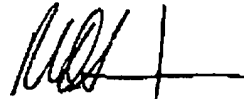
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20 and 21, or the claims dependent therefrom. Thus, the presently pending claims are allowable over the cited references. Accordingly, Assignee respectfully requests that the claim rejections under 35 U.S.C. § 103(a) be withdrawn.

Conclusion

In view of the above remarks, Assignee respectfully submits that this application is in condition for allowance and such action is earnestly requested. If for any reason the Application is not allowable, the examiner is requested to contact the Assignee's undersigned attorney at (312) 321-4200.

Respectfully submitted,



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